



June 6, 2006

To Whom it May Concern;

The FCC has ruled that local cable systems must carry the local television station on their cable system to take care of that community. Furthermore, the FCC recognized that situation where a rural community will most likely not support a full power television station, and therefore, a low power station that fulfills the needs of that community, (ie, local news, local weather, local sports) must also be granted must carry status. In some circumstances, a full power station that cannot get a license to operate in a large community will opt to be licensed in a rural community, only to focus their signal on the larger community, ignoring the rural community. In that situation, the rural community falls into the loophole and suffers as a result. We are asking that you remedy this rule.

In KVHC-LP's situation, there is a full power station, (KRRT) that holds a Kerrville based license to broadcast. KRRT has no office in Kerrville, and no telephone. Their broadcast tower is located in Pipe Creek, Texas, in the next county, and sends its' signal into San Antonio. Their signal is barely attainable in Kerrville, and they do nothing to take care of their city of license. KVHC-LP does take care of Kerrville. We have a full 30 minute newscast each weekday, as well as a 30 minute interview program for events going on in the area. We focus on local news and local weather, especially for tornado alerts and warnings, and flood coverage. We air candidate forums, local high school football, Schreiner University programs and live election coverage.

Time Warner, the local cable company in Kerrville, has a high saturation in Kerrville because of the terrain problem. The hills around Kerrville block San Antonio stations' signals from getting in. KVHC-LP has repeatedly asked Time Warner to place us on their cable system, and they refuse to consider it. Last May, the Kerrville City Council sent a letter to Time Warner asking them to place us on their cable system, and they refused. Their exact wording, was "that by the letter of the law, they do not legally have to".

The very nature of serving a rural community is such that there is little revenue to support a broadcast station. KVHC-LP has to pay the highest possible price allowed by law to Time Warner to buy airtime. KVHC-LP can only afford to buy one and one half hours a day, and several hours on the weekend. There have been in the past, several incidents which occurred in Kerrville, pointing out the absolute necessity for 24 hour coverage on the local cable system. In one situation, a forensic patient at the Kerrville State Hospital escaped during a time that we had not purchased airtime. The Kerrville Police came into our studios with a picture of the escaped patient, who, as a side note, had killed someone in the past. We went on the air with the picture and asked viewers to call police if they saw this man and not to pick him up or have contact with him. The viewers picking us up over the air or on the cable systems in Center Point and Comfort, (which do carry us) got that message. The viewers on Time Warner, did not.



There have also been at least two occasions when gas leaks have closed portions of the major highway in Kerrville, and again, police came to us to get the word out to stay away from this area until they could fix the leak. No one on Time Warner got that message.

We are an important part of the emergency plan for both the city of Kerrville and for the Kerrville Independent School District. In the course that something horrendous happens in either situation, both entities will come to the KVHC-LP studios and have a spokesperson to give a report to the community. All radio stations will be told to tune in to KVHC-LP for the latest information.

You cannot pre-buy airtime for an emergency. Although Time Warner concedes that emergency reports are important, and they will flip the switch to turn us on in the event of an emergency, it may take 40 minutes or more to get someone to their head-end to flip that switch. In addition, they advertise that they provide local news, local sports and local weather to sell cable, but they make KVHC-LP pay them and then they turn back around and sell that important information to the community..... and they don't have to spend one dime to gather that news, pay the reporters, or pay for the equipment it takes to film, edit and transmit that information.

A local television station that takes care of the community deserves to have must carry status on the local cable system. In cases where large stations exist and fully cover the area with local news, local weather and local sports, an LPTV station should not have coverage. When there is a full power station that turns its back on the community it is licensed to, they should forfeit their right to must carry and the FCC should award that must-carry status to the LPTV station that will take care of the community. In a bit of irony, and just to prove to you that KRRT does not care whether or not it's signal gets into Kerrville, according to Susan Ivins, at Time Warner in Kerrville, KRRT has not asked for must carry status.

The citizens in Kerrville are being cheated without having KVHC-LP on their local cable channel 24 hours a day.

Mary Silver
KVHC-LP General Manager